

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED

v.

FORTINET, INC.

LIONRA TECHNOLOGIES LIMITED

v.

CISCO SYSTEMS, INC.

LIONRA TECHNOLOGIES LIMITED

v.

PALO ALTO NETWORKS, INC.

Case No. 2:22-cv-00322-JRG-RSP

(Lead Case)

JURY TRIAL DEMANDED

Case No. 2:22-cv-00305-JRG-RSP

(Member Case)

Case No. 2:22-cv-00334-JRG-RSP

(Member Case)

**JOINT MOTION REGARDING STIPULATION OF
DISMISSAL OF CERTAIN ASSERTED PATENTS BY
LIONRA TECHNOLOGIES LIMITED AND FORTINET, INC.**

Plaintiff Lionra Technologies Limited (“Lionra”), together with Defendant Fortinet, Inc. (“Fortinet”), respectfully submit this Joint Motion requesting that the Court adopt and enter the Joint Stipulation between Lionra and Fortinet regarding the dismissal of certain asserted patents, submitted as Exhibit A to this Motion, in accordance with the Second Amended Docket Control Order (Dkt. No. 160) and following the Court’s November 27, 2023 Claim Construction Order (Dkt. No. 162).

Pursuant to Federal Rule of Civil Procedure 41(a)(2), the parties further request that the Court enter the proposed order attached as Exhibit B to this Motion dismissing Lionra’s claims for infringement of U.S. Patent No. 7,302,708 (“the ’708 patent”) and U.S. Patent No. 7,921,323 (“the ’323 patent”) against Fortinet based on Fortinet’s manufacture, importation, use, sale and/or offer for sale of any accused Fortinet products.

For the reasons set forth herein, Lionra and Fortinet respectfully request that the Court grant this Joint Motion to (1) adopt and enter the Stipulation attached as Exhibit A and (2) enter the proposed order dismissing the claims for infringement of the '708 patent and the '323 patent.

Dated: December 1, 2023

By: /s/ Brett Cooper

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Respectfully submitted,

By: /s/ Dravid Dotson

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Brett Cooper

Brett Cooper

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on December 1, 2023, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett Cooper

Brett Cooper